



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,
Plaintiff,

v.

Yuliana TORREROS-Cota

Defendant.

Magistrate Case No.: 08MJ 8511
COMPLAINT FOR VIOLATION OF
21 U.S.C. § 952 and 960
Importation of a Controlled Substance
(Felony)

The undersigned complainant being duly sworn states:

That on or about June 5, 2008, within the Southern District of California, defendant Yuliana TORREROS-Cota did knowingly and intentionally import approximately 54.22 kilograms (119.55 pounds) of marijuana a Schedule I Controlled Substance, into the United States from a place outside thereof, in violation of Title 21, United States Code, Sections 952 and 960.

The complainant states that this complaint is based on the attached Statement of Facts incorporated herein by reference.


Special Agent
U.S. Immigration & Customs
Enforcement

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE, THIS 6TH,
DAY OF JUNE 2008.


Peter C. Lewis
UNITED STATES MAGISTRATE JUDGE

1 UNITED STATES OF AMERICA

2 v.

3 Yuliana TORREROS-Cota

4 STATEMENT OF FACTS

5 This Statement of Facts is based on the reports, documents, and notes
6 furnished to U. S. Immigration and Customs Enforcement Special Agent Joe
7 Morquecho.

8 On June 5, 2008, at approximately 1127 hours, Yuliana TORREROS-Cota
9 entered the United States at the Calexico, CA West Port of Entry. TORREROS was the
10 driver of 2001 Ford Focus.

11 Customs Border Protection Officer Ramos was assigned to primary lanes when
12 TORREROS entered his lane. TORREROS gave Officer Ramos a negative oral
13 Customs declaration. Officer Ramos noted during the inspection the floor of the vehicle
14 appeared to have a depth discrepancy. Officer Ramos referred TORREROS and the
15 vehicle to the vehicle secondary lot.

16 In the vehicle secondary lot, Officer Ramos requested that Canine Enforcement
17 Officer (CEO) Waters screen the vehicle for contraband with his assigned Narcotic
18 Detector Dog (NDD). CEO Waters noted his NDD alerted to the vehicle.

19 A subsequent inspection of the vehicle revealed 39 packages in a non factory
20 installed compartment under the floorboards of the vehicle. Officer Ramos probed one
21 of the packages and a sample of a green leafy substance was obtained, which field
22 tested positive for marijuana. The 39 packages had a combined net weight of
23 approximately 54.22 kilograms (119.55 pounds).

24 TORREROS was advised of her Constitutional Rights in Spanish, which she
25 acknowledged and waived. TORREROS stated she was told she would be paid
26 \$2,000.00 to drive a vehicle laden with marijuana into the United States. TORREROS
27 said she was given the vehicle to register under her name, but she was not the owner.

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